

UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA

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U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

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Randall S. Krause

Plaintiff(s)

vs.

Case Number:

Metropolitan Entertainment & Convention Authority (MECA)

Defendant(s)

COMPLAINT

A. Parties

- 1) Randall S. Krause ("Krause"), is a citizen of Nebraska
(Plaintiff) (State)
who presently resides at _____ the address below.
(mailing address if different from residence)
- 2) Defendant MECA is a citizen of Omaha, Nebraska, and is
(Name of first defendant) (City, State)
a hybrid public/private entity that operates TD Ameritrade Park Omaha.
(Position and title, if any)

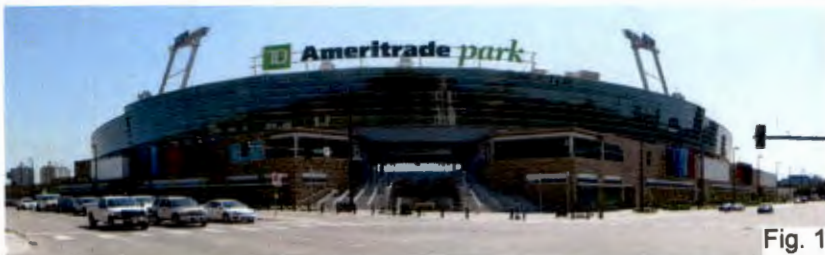


Fig. 1



Fig. 2

B. Jurisdiction

- 1) Jurisdiction is asserted pursuant to:
the 1st and 14th Amendments to the US Constitution. Krause alleges
that MECA's fake recycling program violates these Amendments.

C. Nature of Case

- 1) Briefly state the background of your case:
MECA has placed recycling bins throughout TD Ameritrade Park (Figs. 1-4), but its policy is to send everything it collects to a landfill. MECA's fake recycling program abridges the freedom of speech.

D. Cause of Action

I allege the following:

1. Recycling is political. Putting a recyclable in a recycling bin is

a contribution to a political movement: the environmental movement.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

The environmental movement is a worldwide political movement that promotes stewardship of the earth's resources.

2. Putting a recyclable in a recycling bin is political speech. It is an expression of support for the environmental movement. Recycling bins and the idea of public recycling originated from the movement.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

To express his support for the environmental movement, Krause has put recyclables in the recycling bins at TD Ameritrade Park.

3. MECA's fake recycling program penalizes political speech. The penalty is the landfilling of recyclables, which supporters of the environmental movement oppose because it wastes resources.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

MECA's fake recycling program violates the 1st and 14th Amendments by penalizing political speech without due process of law.

E. Request for Relief

I believe that I am entitled to the following relief:
a ruling that MECA's fake recycling program
violates the 1st and 14th Amendments.



Randall S. Krause
Original Signature of Plaintiff
604 S. 22nd St. Apt. 1115

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